

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

JOHN BOUCHER,

Plaintiff,

v.

Case No. 18-CV-460

DEBRA TIDQUIST AND  
W. BRADFORD MARTIN,

Defendants.

---

**DECLARATION OF SANDRA L. TARVER**

---

I, **Sandra L. Tarver**, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney licensed to practice law within the State of Wisconsin and am employed by the Wisconsin Department of Justice as an Assistant Attorney General.

2. I am the attorney of record for the Defendants in the above-captioned matter.

3. Upon receiving a signed medical release from Plaintiff John Boucher, my office requested a certified copy of Plaintiff's medical records from the San Diego County Sheriff's Department, Department of Corrections, Jackson Correctional Institution's (Jackson) including Jackson's Health Services Unit (HSU).

4. On May 17, 2019, October 18, 2019, November 11, 2019, and November 14, 2019, my office received certified copies of the requested medical records from the records custodian at San Diego County Sheriff's Department, Department of Corrections, and Jackson.

5. Attached hereto as **Exhibit 1000** is an excerpt of the certified medical records my office received.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.*

Executed this 22nd day of November, 2019.

s/Sandra L. Tarver  
SANDRA L. TARVER